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Department of Environment

Ministère de l'Environnement

Feb. 26, 07

Richard Dwyer Licensing Trainee Nunavut Water Board

via Email to: licensingtrainee@nunavutwaterboard.org

RE: NWB FILE # 2BE-IZO – WOLFDEN RESOURCES INC. – IZOK & HOOD PROJECT

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from Wolfden Resources Inc. for its base metal and precious metal exploration project located 265 km south of Kugluktuk, and has the following comments and recommendations to make.

SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut Spill Contingency Planning and Reporting Regulations, and Guideline for the General Management of Hazardous Waste in Nunavut, DOE has the following recommendations to make:

- The name, job title and 24 hour telephone number for the persons responsible for activating the spill plan should be provided. This ensures the employee discovering the spill can activate a response and provides a 24 hour point of contact for the authority investigating the spill.
- According to page 13 of the spill plan dated December 5, 2006, the proponent will "contact Federal and Territorial regulatory agencies to identify appropriate disposal methods before disposing of contaminated material." It is the proponent's responsibility to develop a complete spill plan which addresses the steps to be taken from the start of the spill, up to and including the final clean up and disposal. Regulatory agencies such as DOE can review the final plan to assess its adequacy and provide advice at that time. Regulatory bodies can, and have, provided information and advice in emergency situations, however, these agencies should not be included in a spill plan as routine advisors. Disposal methods should include the location of disposal sites approved by appropriate regulators.

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treatment methods to be received at the disposal sites, the means of storage prior to disposal, and other approvals required.

- A description of the training provided to employees to respond to a spill should be provided. A sound training program is necessary when dealing with an emergency situation.
- The DOE monitors the movement of hazardous wastes including waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the DOE. This registration can be done by contacting Rob Eno at (867) 975-7748 or reno@gov.nu.ca.
- The proponent is recommended to utilize the newly developed spill report form in the case of spills, and to enter spill information via a computer so it is legible to recipients such as government agencies. The attached include the new spill form and instructions for completing the forms.

The DOE thanks the NWB for the opportunity to review and provide comments on the renewal application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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Attachment 1: NT-NU Spill Report Form

Attachment 2: Instructions for Completing the NT-NU Spill Report Form

